



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korieski, Director

May 29, 2007

**RE: Coshocton County
Clow Water Systems
0616010006 F004, F007 & P007
COMPLIANCE TEST**

Ms. Heather Klesch
Clow Water Systems
2266 South Sixth St.
P.O. Box 6001
Coshocton, Ohio 43812-6001

Dear Ms. Klesch:

On April 17, 2007, Air Compliance Testing performed a particulate emission compliance test at Clow Water Systems, 2266 South Sixth Street, Coshocton on the jolt sand system, ladle and shake out (Emissions Unit F004, F007 and P007). Ohio EPA received the test report on May 17, 2007. The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Method(s) 1-5. The results of the test showed the source to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Our test review shows the following:

A.	Tested Emission Rate:	0.005 gr/dscf	2.95 lb/hr
B.	Allowable Emission Rate:	0.0075 gr/dscf	5.78 lb/hr
C.	Source Operating Rate:	P007-60.8 tph, F004-63.8 tph, F007-5.16 tph	
D.	Isokinetic Rate:	Run #1 - 93%; Run #2 - 93%; Run #3 - 94%	

All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to Ms. Kim Reinbold, Ohio EPA Southeast District Office, at 740-380-5245.

Thank you for your cooperation in this matter.

Sincerely,

Lisa Duvall
Environmental Specialist
Division of Air Pollution Control

LD/mlm

cc: Kim Reinbold (Emissions Unit File Copy)
Dean Ponchak, DAPC-SEDO w/ CETA summary attachment
Test Report File Copy

Kimbra Reinbold - Notification

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 11/5/2007 1:25 PM
Subject: Notification

Kim,

At 8:34 am on November 5, 2007, the wet cap opened due to a loss of water in the system. It is believed that an air actuator worked improperly not allowing adequate water flow. Water flow resumed and the cap closed at 8:42 am for normal operation. Because of the interlocking system discussed in previous notifications, Clow does not feel this is a malfunction but will continue to inform you of such events as a courtesy.

If you have any questions regarding the above, please feel free to call.

Sincerely,

Heather A. Klesch

Environmental Manager

CLOW Water Systems Company

(740) 622-6651 ext. 229 office

(740) 502-0577 cellular

heather.klesch@clowwater.com



CLOW WATER SYSTEMS COMPANY

2007 OCT 24 AM 11:25

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812-6001
(740) 622-6651
FAX (740) 622-8551

October 19, 2007

Kimbra Reinbold
Ohio EPA, SEDO
2195 Front Street
Logan, Ohio 43138-8687

**Re: 3rd Quarter 2007 Deviation Report
Clow Water Systems Company
Coshocton, Ohio
Facility ID: 06-16-01-0006**

Dear Ms. Reinbold,

Please find enclosed the 3rd quarter deviation report for 2007 in accordance with the Title V Permit for Clow Water Systems Company located in Coshocton, Ohio.

If you have any questions or require additional information, please feel free to contact me at 740-291-1087.

Sincerely,

Heather A. Klesch
Environmental Manager
Clow Water Systems Company

3rd Quarter 2007 Deviation Report (July 1, 2007 – September 30, 2007)

Unit(s)	Parameters	Findings
B001, B002, B006, B007, F004, F005, F007, F009, F010, F014, F015, F016, F018, F022, K001, K002, K006, K007, K008, K009, P020, P033, P901, Z004, Z008, Z024, Z074, Z075, Z076, Z077, Z081, Z082, Z129, Z131, Z132	Individual HAP emissions 12-month rolling sum < 9.9 tons	No Deviation
	Total HAP emissions 12-month rolling sum < 24.9 tons	No Deviation
K001, K006, K007, K008, K009, Z008, Z074, Z076, Z077, Z081, Z082	HAP containing materials	None
F007, F009, P007	Metal poured 12-month rolling sum < 15,000 tons	No Deviation
	Sand handled 12-month rolling sum < 175,000 tons	No Deviation
F004, F007, P007	PE emitted < 5.78 lb/hr	No Deviation
F007, F009	CO emitted < 27.0 lb/hr	No Deviation
	CO emitted 12-month rolling sum < 33.75 tons	No Deviation
P020, P033	Syngas burned 12-month rolling sum < 600,405 BTU	Units Not Modified for Syngas
F005, F022	VOC emitted < 8.50 lb/hr	No Deviation
F002	Zero visible emissions	No Deviation
F005	VOC emitted 12-month rolling sum < 9.0 tons	No Deviation
	PE fugitive emitted < 2.1 lb/hr	No Deviation
	VOC emitted < 32.4 lb/hr	No Deviation
	Zero visible emissions	No Deviation
F007	PM emitted < 0.38 lb/hr	No Deviation
	PM emitted 12-month rolling sum < 0.48 tons	No Deviation
	PM10 emitted < 0.26 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 0.34 tons	No Deviation
	VOC emitted < 7.2 lb/hr	No Deviation
	Fugitive visible emissions < 5%	No Deviation
	Zero visible stack emissions	No Deviation
F009	PM emitted < 3.84 lb/hr	No Deviation

Unit(s)	Parameters	Findings
	PM emitted 12-month rolling sum < 4.8 tons	No Deviation
F009 (cont.)	PM10 emitted < 3.84 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 4.8 tons	No Deviation
	VOC emitted < 1.2 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
F010	Metal poured 12-month rolling sum < 20,000 tons	No Deviation
P007	PM emitted < 5.38 lb/hr	No Deviation
	PM emitted 12-month rolling sum < 4.71 tons	No Deviation
	PM10 emitted < 0.54 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 0.71 tons	No Deviation
	Fugitive visible emissions < 5%	No Deviation
	Zero visible stack emissions	No Deviation
F014	VOC emitted < 3.25 lb/hr	No Deviation
	Zero visible emissions	No Deviation
	VOC emitted 12-month rolling sum < 9.75 tons	No Deviation
F015	Metal processed 12-month rolling sum < 36,000 tons	No Deviation
F022	VOC emitted 12-month rolling sum < 12.87 tons	No Deviation
	PE fugitive emitted < 0.05 lb/hr	No Deviation
	VOC emitted < 14.69 lb/hr	No Deviation
	Zero visible emissions	No Deviation
K002	Coating with VOC content > 3.5 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	PE < 0.551 lb/hr	No Deviation
	Operation with 98% efficient paint filter	No Deviation
K006	Coating with VOC content > 3.5 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	PE < 1.91 lb/hr	No Deviation
	Operation with 98% efficient paint filter	No Deviation
K007	PRM coating	None
K008	PRM coating	None
K009	PRM coating	None
	VOC emitted < 10 lb/hr	No Deviation
	VOC emitted 12-month rolling sum < 30 tons	No Deviation
P033	PE emitted < 0.020 lb/mmBTU	No Deviation
	Visible emissions < 20%	No Deviation
	Only natural gas burned as fuel	No Deviation

Unit(s)	Parameters	Findings
P034	OC emitted < 8.7 lb/hr	No Deviation
	PE emitted < 0.4 lb/hr	No Deviation
P034 (cont.)	Ammonia emitted < 7.32 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
P035	Visible emissions < 20%	No Deviation
	PE emitted < 4.6 lb/hr	No Deviation
P036	Visible emissions < 20%	No Deviation
	PE emitted < 9.7 lb/hr	No Deviation
P037	Visible emissions < 20%	Unit Not In Operation
	PE emitted < 49.7 lb/hr	
P038	Visible emissions < 20%	No Deviation
	PE emitted < 7.4 lb/hr	No Deviation
P901	Metal melted 12-month rolling sum < 275,000 tons	No Deviation
	PE emitted < 50 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	Afterburner temperature > 1300°F	See attached
	Venturi pressure drop between 35 in. H ₂ O and 60 in. H ₂ O	See attached

Emission Unit P901 – Cupola

Afterburner Temperature < 1300 F

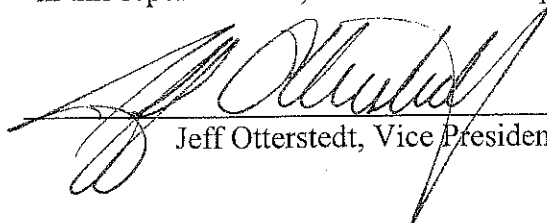
Date	Time	Duration (min)	Cause	Corrective Action
No Deviations				

Venturi Pressure Drop < 35 and > 60 in. H₂O

Date	Time	Duration (min)	Cause	Corrective Action
8/8/07	09:53 – 10:23	30	< 35; unknown	Stabilized system
9/11/07	03:25 – 03:55	30	< 35; unknown	Stabilized system

Certification

Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate and complete.



Jeff Otterstedt, Vice President/General Manager

10-22-07

Date

OHIO EPA ELECTRONIC SUBMITTAL RECEIPT VERIFICATION/CERTIFICATION REGARDING
CONTENT OF THE ELECTRONICALLY TRANSMITTED TITLE V APPLICATION

0616010006 Clow Water Systems Company

Control Number: 0000023108

The Title V Application associated with the control number identified above
is being submitted for the purpose(s) indicated below:

- ☒ Initial application, renewal or correction/revision to the initial
or renewal application per OAC rule 3745-77-08(C)(3)
- ☐ Section 112(J) Part II application per 40 CFR Part 63 Subpart B
- ☐ Off-Permit Change per OAC rule 3745-77-07(I)
- ☐ Minor permit modification per OAC rule 3745-77-08(C)(1)
- ☐ Significant modification per OAC rule 3745-77-08(C)(3)
- ☐ Reopening for cause per OAC rule 3745-77-08(D)

SIGNATURE FOR STATEMENT

This statement shall be signed by the responsible official as defined in OAC
rule 3745-77-01(GG). Making of any false material statement, representation
or certification constitutes a violation of ORC 3704.05(H), and subjects the
responsible party signing this statement to civil and/or criminal penalties
as provided in ORC 3704.06(C) and ORC 3704. For the purposes of determining
completeness under OAC 3745-77-03(D), only those statements made in response
to those inquiries designated in Ohio EPA Engineering Guide #59 as applicable
requirement inquiries shall be used as a determination of whether or not this
Title V Application associated with the control number identified above is
complete.

CERTIFICATION

Based on information and belief formed as responsible inquiry, I, being the
individual specified in OAC rule 3745-77-03(D), hereby affirm that the
statements as transmitted in this Title V application for the purpose(s)
indicated above and associated with the control number identified above, are
true, accurate and complete to the best of my knowledge.

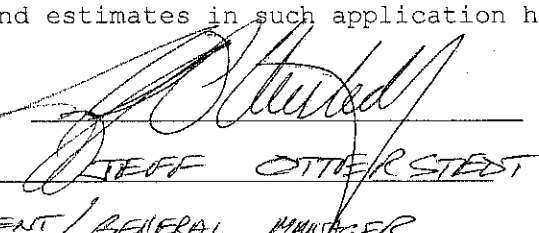
I affirm, based on information and belief formed after reasonable inquiry,
that all other factual statements in this Title V application associated with
the control number identified above are true to the best of my knowledge, and
that all judgments and estimates in such application have been made in good
faith.

Authorized Signature

Name (Please Print)

Title

Date


JEFF OTTERSTEE
VICE PRESIDENT / GENERAL MANAGER

Is there additional information attached to supplement this Title V
Application?

Yes ☐ No ☒

If yes, the additional information listed below is considered part of the
Title V application associated with the control number identified above
and is attached to this receipt.

2007 SEP 24 AM 11:51

Vorys, Sater, Seymour and Pease LLP

Suite 2000 • Atrium Two • 221 E. Fourth Street • Post Office Box 0236 • Cincinnati, Ohio 45201-0236 • Telephone (513) 723-4000 • Facsimile (513) 723-4056

Arthur L. Vorys
1856-1933
Lowry E. Sater
1867-1935
Augustus T. Seymour
1873-1928
Edward L. Pease
1873-1924

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William D. Hayes
Direct Dial (513) 723-4024
Facsimile (513) 852-7854
E-Mail - wdhayes@vssp.com

RECEIVED

AUG 20 2007

August 16, 2007

Ohio Environmental
Protection Agency
Southeast District

Ms. Kimbra Reinbold
Ohio EPA SEDO- DAPC
2195 Front Street
Logan, OH 43138

Re: Clow Water Systems

Dear Kimbra:

Thank you for your thorough review and response to our July 3, 2007 letter. The goal of this letter is to address any issues that were identified as outstanding in your July 18th letter.

1. Response to 7/18/07 letter, page 2, item 5

A Title V permit modification will be submitted by September 19, 2007.

2. Response to 7/18/07 letter, page 3, item 7

(a) The reference to K020 was a typo and should have been P020.

(b) The requested allowable table in the PTI should have listed annual emission rates of 1.28 tpy for both PM and PM10 to match the provided emission calculations and the Supplementary Information for Federally Enforceable Limits sheet.

3. Response to 7/18/07 letter, page 2, item 8

The installation date will be added to STARS for Z129. There has been no modification for this emissions unit.

Ms. Kimbra Reinbold
August 16, 2007
Page 2

4. Response to 7/18/07 letter, page 2, item 11, roadways

(a) The actual annual vehicle miles traveled (VMT) was calculated as the product of the measured distance traveled by the annualized trips. The potential VMT was then calculated as the product of the actual annualized VMT and the following ratio:

For slag, potential melt rate to actual melt rate. Slag generation is dependent on the melt rate.

For sand, potential metal poured in the fittings foundry to actual metal poured in the fittings foundry. Sand generation rate is substantially dependent on fittings production rate.

For large lift trucks, potential pipe production rate to actual pipe production rate. Use of large lift trucks is dependent on the production of iron pipe.

(b) The mileage would equate to any large lift truck that would be required to store pipe at the potential production rate in the beneficial reuse area.

(c)(1) There are two roads that lead into the beneficial reuse area. One is paved and one is unpaved. Because the entry route is uncertain, to produce worst case results it was assumed all traffic would enter via the unpaved area. The initial unpaved entrance road is 360' when then takes a 90 degree turn to the right and travels approximately 180'. It was then estimated that the approximate midpoint of any storage location would be approximately 180'. This equates to a one way distance of 720'.

(c)(2) Comment #3 states "Potential PM/PM10 emissions after the modification are scaled based on the hourly increase for truck traffic and no change for employee traffic." This means that through discussions with Clow it was determined to increase production to the potential levels no new employees would be necessary, but all other vehicle travel was increased to accommodate additional traffic (e.g. Fed Ex trucks, scrap deliver trucks, etc.)

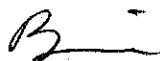
(c)(3) See above, all travel to the beneficial reuse area was assumed to go down the unpaved route.

Ms. Kimbra Reinbold
August 16, 2007
Page 3

(d) All other material is included in the emissions from the Solid Waste Bunker (F019).

Please do not hesitate to let us know if you have additional questions.

Sincerely,



William D. Hayes

WDH/wdh

cc: Heather Klensch, Clow
Craig Schmeisser, RMT

Kimbra Reinbold - Notification 8-12-07

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 8/13/2007 8:29 AM
Subject: Notification 8-12-07

Kim,

At 9:20pm on August 12, 2007, the cap opened. This was caused by failure of the east emissions fan. The bearings were replaced in the fan and the cap closed at 10:44pm and normal operations resumed.

At 10:57pm on August 12, 2007, the cap opened due to loss of water. While maintenance was being performed in the emissions/WWTP area, a valve was accidentally closed causing the wet cap to be starved of water. The cap closed at 11:16pm and normal operations resumed.

Because of the interlocking system discussed in previous notifications, Clow does not feel this is a malfunction but will continue to inform you of such events as a courtesy.

If you have any questions regarding the above, please feel free to call.

Thanks,

Heather A. Klesch

Environmental Manager

CLOW Water Systems Company

(740) 622-6651 ext. 229 office

(740) 502-0577 cellular

heather.klesch@clowwater.com

Kimbra Reinbold - Notification

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 8/12/2007 4:20 PM
Subject: Notification

Kimbra,

On Thursday August 8, 2007 the Wet Cap opened at 11:59pm due to short in the pump's wiring causing a pump failure and starving the wet cap of water. Water was restored and the cap closed at 1:22am August 9, 2007 and normal operations resumed. Because of the interlocking system discussed in previous notifications, Clow does not feel this is a malfunction but will continue to inform you of such events as a courtesy.

Sorry for the delay in this notification, I have been out of town. I am working with the employees to notify me via cellular phone so that I can notify you immediately of these occurrences. If you have any questions please feel free to call me.

Heather A. Klesch

Environmental Manager

CLOW Water Systems Company

(740) 622-6651 ext. 229 office

(740) 502-0577 cellular

heather.klesch@clowwater.com



CLOW WATER SYSTEMS COMPANY

2007 JUL 27 AM 10:51

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812-6001
(740) 622-6651
FAX (740) 622-8551

July 24, 2007

Kimbra Reinbold
Ohio EPA, SEDO
2195 Front Street
Logan, Ohio 43138-8687

**Re: 2nd Quarter 2007 Deviation Report and
Semi-Annual Deviation Report
Clow Water Systems Company
Coshocton, Ohio
Facility ID: 06-16-01-0006**

Dear Ms. Reinbold,

Please find enclosed the 2nd quarter and semi-annual deviation report for 2007 in accordance with the Title V Permit for Clow Water Systems Company located in Coshocton, Ohio.

If you have any questions or require additional information, please feel free to contact me at 740-291-1087.

Sincerely,

Heather A. Klesch
Environmental Manager
Clow Water Systems Company

2nd Quarter 2007 Deviation Report (April 1, 2007 – June 30, 2007)

Unit(s)	Parameters	Findings
B001, B002, B006, B007, F004, F005, F007, F009, F010, F014, F015, F016, F018, F022, K001, K002, K006, K007, K008, K009, P020, P033, P901, Z004, Z008, Z024, Z074, Z075, Z076, Z077, Z081, Z082, Z129, Z131, Z132	Individual HAP emissions 12-month rolling sum < 9.9 tons	No Deviation
	Total HAP emissions 12-month rolling sum < 24.9 tons	No Deviation
K001, K006, K007, K008, K009, Z008, Z074, Z076, Z077, Z081, Z082	HAP containing materials	None
F007, F009, P007	Metal poured 12-month rolling sum < 15,000 tons	No Deviation
	Sand handled 12-month rolling sum < 175,000 tons	No Deviation
F004, F007, P007	PE emitted < 5.78 lb/hr	No Deviation
F007, F009	CO emitted < 27.0 lb/hr	No Deviation
	CO emitted 12-month rolling sum < 33.75 tons	No Deviation
P020, P033	Syngas burned 12-month rolling sum < 600,405 BTU	Units Not Modified for Syngas
F005, F022	VOC emitted < 8.50 lb/hr	No Deviation
F002	Zero visible emissions	No Deviation
F005	VOC emitted 12-month rolling sum < 9.0 tons	No Deviation
	PE fugitive emitted < 2.1 lb/hr	No Deviation
	VOC emitted < 32.4 lb/hr	No Deviation
	Zero visible emissions	No Deviation
F007	PM emitted < 0.38 lb/hr	No Deviation
	PM emitted 12-month rolling sum < 0.48 tons	No Deviation
	PM10 emitted < 0.26 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 0.34 tons	No Deviation
	VOC emitted < 7.2 lb/hr	No Deviation
	Fugitive visible emissions < 5%	No Deviation
	Zero visible stack emissions	No Deviation
F009	PM emitted < 3.84 lb/hr	No Deviation
	PM emitted 12-month rolling sum < 4.8 tons	No Deviation

Unit(s)	Parameters	Findings
F009 (cont.)	PM10 emitted < 3.84 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 4.8 tons	No Deviation
	VOC emitted < 1.2 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
F010	Metal poured 12-month rolling sum < 20,000 tons	No Deviation
P007	PM emitted < 5.38 lb/hr	No Deviation
	PM emitted 12-month rolling sum < 4.71 tons	No Deviation
	PM10 emitted < 0.54 lb/hr	No Deviation
	PM10 emitted 12-month rolling sum < 0.71 tons	No Deviation
	Fugitive visible emissions < 5%	No Deviation
	Zero visible stack emissions	No Deviation
F014	VOC emitted < 3.25 lb/hr	No Deviation
	Zero visible emissions	No Deviation
	VOC emitted 12-month rolling sum < 9.75 tons	No Deviation
F015	Metal processed 12-month rolling sum < 36,000 tons	No Deviation
F022	VOC emitted 12-month rolling sum < 12.87 tons	No Deviation
	PE fugitive emitted < 0.05 lb/hr	No Deviation
	VOC emitted < 14.69 lb/hr	No Deviation
	Zero visible emissions	No Deviation
K002	Coating with VOC content > 3.5 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	PE < 0.551 lb/hr	No Deviation
	Operation with 98% efficient paint filter	No Deviation
K006	Coating with VOC content > 3.5 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	PE < 1.91 lb/hr	No Deviation
	Operation with 98% efficient paint filter	No Deviation
K007	PRM coating	None
K008	PRM coating	None
K009	PRM coating	None
	VOC emitted < 10 lb/hr	No Deviation
	VOC emitted 12-month rolling sum < 30 tons	No Deviation
P033	PE emitted < 0.020 lb/mmBTU	No Deviation
	Visible emissions < 20%	No Deviation
	Only natural gas burned as fuel	No Deviation
P034	OC emitted < 8.7 lb/hr	No Deviation
	PE emitted < 0.4 lb/hr	No Deviation

Unit(s)	Parameters	Findings
P034 (cont.)	Ammonia emitted < 7.32 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
P035	Visible emissions < 20%	No Deviation
	PE emitted < 4.6 lb/hr	No Deviation
P036	Visible emissions < 20%	No Deviation
	PE emitted < 9.7 lb/hr	No Deviation
P037	Visible emissions < 20%	Unit Not Installed
	PE emitted < 49.7 lb/hr	
P038	Visible emissions < 20%	No Deviation
	PE emitted < 7.4 lb/hr	No Deviation
P901	Metal melted 12-month rolling sum < 275,000 tons	No Deviation
	PE emitted < 50 lb/hr	No Deviation
	Visible emissions < 20%	No Deviation
	Afterburner temperature > 1300°F	See attached
	Venturi pressure drop between 35 in. H ₂ O and 60 in. H ₂ O	See attached

Emission Unit P901 – Cupola

Afterburner Temperature < 1300 F

Date	Time	Duration (min)	Cause	Corrective Action
4/16/07	02:14 – 03:08	54	Meltout of Cupola to repair water leak	Shutdown; Maintenance Performed
4/16/07	04:35 – 04:38	3	Failed to reach temp at startup	Shutdown
5/7/07	00:50 – 00:54	4	Missing temp data	See footnote below ¹
5/9/07	04:04 – 04:07	3	Temp dropped after startup	Stabilized system
5/9/07	08:31 – 08:41	10	Missing temp data	See footnote below ¹
5/30/07	07:06 – 07:08	2	Low temp before shutdown	Shutdown
5/30/07	07:40 – 07:52	12	Thermocouple	Replaced thermocouple
5/30/07	10:41 – 10:47	6	Missing data	See footnote below ¹
5/30/07	11:51	1	Missing data	See footnote below ¹
5/30/07	11:54	1	Missing data	See footnote below ¹
6/11/07	14:38 – 14:39	2	Low temp before shutdown	Shutdown
6/12/07	07:51 – 07:56	5	Failed to reach temp at startup	Stabilized system
6/18/07	22:17 – 22:24	7	Failed to reach temp at startup	Stabilized system

Venturi Pressure Drop < 35 and > 60 in. H₂O

Date	Time	Duration (min)	Cause	Corrective Action
4/17/07	13:41 – 13:46	15	Faulty Pressure Sensor	< 35; Maintenance performed
5/3/07	14:18 – 14:41	24	Melting out	< 35; Shutdown
5/16/07	22:56 – 23:26	30	Unknown	< 35; Stabilized system

¹ Clow is currently recording from a computer; therefore if the computer has an interruption, there is an interruption in recordkeeping. To remedy this issue, Clow has installed a device that allows data to be recorded without the use of a computer.

Semi-Annual 2007 Deviation Report (January 1, 2007 – June 30, 2007)

For deviations of operational restrictions and limitations, see above as well as the 1st quarter deviation report for 2007 dated April 30, 2007.

Deviations from monitoring, recordkeeping², and reporting are as follows:

Emission Unit	Term and Condition	Description
P035	Part I Section B. 8	Installation certificate was submitted after installation but not prior to start-up of control device.
P036		
P038		
F007	Part III Section A. III. 1.	Weekly checks for fugitive emissions were not conducted from the side draft hood but from the production area itself and building egress points until April 2007.
P007		

² Recordkeeping deviations for Emissions Unit 901 are reported as part of the quarterly deviation report.

Certification

Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate and complete.

A handwritten signature in black ink, appearing to read "Jeff Otterstedt", is written over a horizontal line.

Jeff Otterstedt, Vice President/General Manager

7-25-07

Date

Kimbra Reinbold - Notification

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 7/25/2007 4:41 PM
Subject: Notification

Kimbra,

On Tuesday July 24, 2007, the Wet Cap opened at 8:04am due to a lack of water. Further investigation found the make-up water pumps were not activated therefore starving the wet cap of water. We are looking into a different activation device. Water was restored and the cap closed at 8:10am and normal operations resumed. Because of the interlocking system discussed in previous notifications, Clow does not feel this is a malfunction but will continue to inform you of such events as a courtesy.

Sorry for the delay in this notification, I have been out of the office. If you have any questions please feel free to call me.

Thanks!

Heather A. Klesch

Environmental Manager

CLOW Water Systems Company

(740) 622-6651 ext. 229 office

(740) 502-0577 cellular

heather.klesch@clowwater.com

Kimbra Reinbold - Notification

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 7/18/2007 4:08 PM
Subject: Notification

Kim,

On Wednesday July 18, 2007 at 12:42pm the cap opened on the Cupola (EU 901). This was caused by a disruption in water to the wet cap during maintenance activities. An electrician accidentally turned off a valve while replacing an actuator which starved the Wet Cap. Water was quickly supplied to the wet cap so we could resume normal operation at 12:50pm. During this disruption time, an interlock between the water system, air system, and Cupola cap, caused the air system to be shutdown and cap to be opened simultaneously. Because of this interlocking shutdown system, we do not consider this a malfunction.

However, in an effort to continue with open communication, please consider this notification as a courtesy email.

If you have any questions, please feel free to contact me.

Thanks!!

Heather A. Klesch

Environmental Manager

CLOW Water Systems Company

(740) 622-6651 ext. 229 office

(740) 502-0577 cellular

heather.klesch@clowwater.com



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

July 18, 2007

Re: Coshocton County
Clow Water Systems Company
Facility ID # 0616010006
Compliance Plan Acceptance

Heather A. Klesch, Environmental Manager
Clow Water Systems Company
P.O. Box 6001
2266 South Sixth Street
Coshocton, OH 43812-6001

Dear Ms. Klesch:

This letter is in response to the letter received via email from Mr. William Hayes with Vorys, Sater, Seymour and Pease on July 3, 2007 (hardcopy received July 9, 2007), regarding Clow Water Systems Company's (Clow's) Plan and Schedule for bringing the facility into compliance with Ohio's air pollution laws and rules. Mr. Hayes' letter was submitted in response to Ohio EPA's letters dated April 13 and May 30, 2007.

Ohio EPA accepts Clow Water Systems Company's Plan and Schedule as detailed in the July 3, 2007 submittal, except as indicated in the following comments and questions:

Response to May 30, 2007 letter:

- (1) Page 1, 2nd paragraph. Mr. Hayes stated that Ohio EPA was incorrect to have used installation dates from the original Title V application in citing Permit-to-Install (PTI) violations. As was stated in Ohio EPA's April 13, 2007 letter, the installation and modification dates upon which the cited violations were based were from the renewal Title V application received in December of 2004. Further, the items in the Application Questions and Comments section of the May 30, 2007 letter were not cited as violations; these were permit issues only. References to the original Title V application in that section were included when discrepancies between the original and renewal application were found and confirmation of dates was needed.
- (2) Page 2, 1st full paragraph. Clow disputes Violation # 1 in the May 30, 2007 letter that was cited for modifying three emissions units prior to issuance of the PTI. While Mr. Hayes is correct that the installation of the baghouse itself does not require a PTI, the requirement to obtain a PTI was triggered upon modification of the units in a manner that resulted in loss of the exemption in OAC rule 3745-31-03(A)(1)(z). Therefore, since Ohio EPA was informed that the modified units began operating in early January of 2007, prior to issuance of the PTI, Ohio EPA continues to contend that Clow was in violation of OAC rule 3745-31-02(A)(1) until January 30, 2007 when PTI # 06-08238 was issued for the modified sources.

- (3) Page 2, Monitoring and Recordkeeping section. As Ms. Klesch and I discussed during the Title V inspection, the monitoring and recordkeeping requirements in PTI #06-07603 are confusing, especially when the standard language for VE checks includes the "when weather conditions allow" language and the testing requirement references Method 9. However, the VE check language for P007 does not state that checks for visible emissions are to be conducted at building egress points. Regardless, Clow has modified its inspection process to check for visible emissions from the side draft hood as demonstrated by the completed inspection logs provided with Mr. Hayes' letter, so this violation has been resolved.
- (4) Page 3, Complaint Investigation. To date, Ohio EPA has not submitted the sample collected by Mr. Lindsay for analysis and we agree this sample would not meet the evidentiary standards. Because Clow has taken steps to address the neighbor's dust and other complaints, no additional sampling is planned currently. As was indicated in my June 4, 2007 email to you, Ohio EPA appreciates Clow's efforts to address fugitive dust that may be impacting its neighbors.
- (5) Page 3, item (2). Please note the December 28, 2006 modification of PTI #06-07603 was completed AFTER the jolt line modifications were completed in September 2006. The modified PTI was requested by Clow to obtain federally enforceable operating restrictions that would prevent the company from having to comply with MACT subparts MMMM and EEEEE. Part I.A.10.a. of both the modified PTI and the original PTI for this unit (issued on June 13, 2006) state "the permittee shall submit...a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. The installation certifications submitted for the jolt line indicate the modification of these sources was completed on September 19, 2006, and it is assumed that operation began shortly thereafter when the plant was restarted after the fall shutdown. Therefore, the Title V permit modifications would not be required until September 2007, not December 2007 as stated by Mr. Hayes.
- (6) Page 4, item (5). Mr. Hayes' letter did not address Ohio EPA's request to confirm the installation date of emissions unit F013. If it was installed in June of 1978 and these units were not DeMinimis or exempt, a PTI would have been required but was never applied for. However, because these units have been removed, no further action is required.

Response to April 13, 2007 letter:

- (7) Pages 10-11, item (1)(a). Ohio EPA has received the PTI application for F018 on July 6, 2007, as well as the revisions provided by Craig Schmeisser with RMT via email on July 9, 2007. A preliminary completeness letter for this application will be forwarded to Clow under separate cover. However, I have questions about the responses for K006 and P020:

- (a) Where Mr. Hayes referenced K020, should Ohio EPA assume he meant P020?
- (b) I confirmed that the emissions limits requested by Clow for K006 and P020 in the PSD permit application are the same as those identified in Mr. Hayes' letter. Further, the application does state that Clow will employ BAT for all emissions units in the application. Because the PSD permit has not been issued final yet, Clow has yet to obtain a PTI for and currently has no BAT limits for these two units.

However, while looking through the PSD application for K006, a question arose as to why a higher allowable was requested in the restriction (PM10 = 1.28 tpy vs. 1.20 tpy) in the requested allowable table. Please explain this discrepancy.

- (8) Page 11, item (2). The installation date and any modification dates, if applicable, still need to be added to STARS for emissions unit Z129.
- (9) Pages 11-12, item (3). As indicated in #5, above, the modification of PTI #06-07603 that was issued on December 28, 2006 did not change the emissions testing requirements in the original PTI issued on June 13, 2006. In both the original and modified PTIs, the emissions units were required to be tested within 6 months of modification of the unit. The installation certifications indicate the modification occurred on September 19, 2006, so testing was required on or before March 19, 2007. So although the testing was completed late, it has been conducted and no further action is required.
- (10) Page 12, item (4). Comment #1 in Ohio EPA's April 13, 2007 letter acknowledged that emissions unit F022 has already been added to Clow's renewal Title V permit. This comment was only included to ensure that emissions unit Z073 is identified as permanently shut down.

Roadways and storage pile calculations submitted with Clow's email dated July 6, 2007

- (11) I have completed a cursory review of the calculations provided, but cannot make a determination on the status of these units until the following questions and concerns are addressed:
 - (a) Unpaved roadways. More information is needed on how the annual vehicle miles traveled was calculated for unpaved roadways. It would seem the annual vehicle miles, based on 15 vehicle miles traveled per hour, would be much greater than the annual miles listed in the table.
 - (b) Unpaved roadways. It appears there is more than one large lift truck used on site. Does the annual vehicle miles traveled figure represent the total for all of those trucks or does it only represent the miles traveled by one of those trucks?

Heather A. Klesch, Environmental Manager
Clow Water Systems Company
July 18, 2007
Page 4

- (c) Paved or unpaved roadways. There is no indication that the new beneficial reuse area roadway was evaluated in either the paved or unpaved roadway calculations. Please direct me to where these calculations are provided. Is this covered in footnote #3 for paved roadways? Please elaborate on what was meant by footnote #3 and whether that is where the additional road traffic is accounted for. Further, it was my understanding that at least part of the new roadway is unpaved so please confirm whether traffic increases in that area were considered in the unpaved roadway calculations.
- (d) Storage piles. It appears the storage pile calculations only cover emissions from the new beneficial reuse piles, not the existing beneficial reuse piles as was requested in my April 13, 2007 letter. Please provide those calculations or explain how this unit has been evaluated in the pile calculations already submitted.

Acceptance by the Ohio EPA of a schedule for compliance does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in section 3704.6 of the Ohio Revised Code. The determination to pursue or to decline such penalties in this case will be made at a later date.

Should you have any questions, feel free to contact me at (740) 380-5245.

Sincerely,



Kimbra Reinbold
Division of Air Pollution Control
Southeast District Office

KR/mlm

cc: William D. Hayes, Vorys, Sater, Seymour and Pease

Kimbra Reinbold - Clow Water Systems: Roadway and Beneficial Reuse Calculations

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 7/6/2007 11:32 AM
Subject: Clow Water Systems: Roadway and Beneficial Reuse Calculations
CC: <wdhayes@vssp.com>, "Craig Schmeisser" <Craig.Schmeisser@rmtinc.com>, "Jeff Otterstedt" <jeff.otterstedt@clowwater.com>, "Jeet Radia" <jradia@mewan.com>, "Alan Truitt" <atruitt@maynardcooper.com>

Kim,

Please find attached the calculations referenced in William Hayes' (Vorys, Sater, Seymour and Pease) email dated July 3, 2007.

If you have any questions please let me know.

Thanks,
Heather A. Klesch
Environmental Manager
CLOW Water Systems Company
(740) 622-6651 ext. 229 office
(740) 502-0577 cellular
heather.klesch@clowwater.com

Kimbra Reinbold - Clow Water Systems: Roadway and Beneficial Reuse Calculations

From: "Heather Klesch" <heather.klesch@clowwater.com>
To: "Kimbra Reinbold" <Kimbra.Reinbold@epa.state.oh.us>
Date: 7/6/2007 11:32 AM
Subject: Clow Water Systems: Roadway and Beneficial Reuse Calculations
CC: <wdhayes@vssp.com>, "Craig Schmeisser" <Craig.Schmeisser@rmtinc.com>, "Jeff Otterstedt" <jeff.otterstedt@clowwater.com>, "Jeet Radia" <jradia@mcwane.com>, "Alan Truitt" <atruitt@maynardcooper.com>

Kim,

Please find attached the calculations referenced in William Hayes' (Vorys, Sater, Seymour and Pease) email dated July 3, 2007.

If you have any questions please let me know.

Thanks,
Heather A. Klesch
Environmental Manager
CLOW Water Systems Company
(740) 622-6651 ext. 229 office
(740) 502-0577 cellular
heather.klesch@clowwater.com

CLOW WATER SYSTEMS COMPANY
Coshocton, OH
Emission Unit Calculations

CLOW Water Systems Company
Coshocton, OH

Plant Roads and Parking Areas (R019)
Paved Road Emission Calculation
AP-42 (10/97 Version) Ch. 13.2.1

$$E = k \cdot (sL/2)^{0.65} \cdot (W/3)^{1.5}$$

E = particulate emission factor (lb/VMT)

k = Base emission factor (lb/VMT)

sL = Silt loading (g/m²)

W = Mean vehicle weight (tons)

Area	k lb/VMT	sL ¹ g/m ²	W tons	E lb/VMT	# of trips per year	# of miles per trip	Total miles per year	Control Efficiency ⁴	Control Efficiency ²	Average Actual Emissions			Potential Emissions	
										PM/PM ₁₀ Emissions (lb/hr)	PM/PM ₁₀ Emissions (TPY)	PM/PM ₁₀ Emissions ³ (lb/hr)	PM/PM ₁₀ Emissions (TPY)	PM/PM ₁₀ Emissions (TPY)
F1	0.082	1.7	4	0.11	33215	0.14	4650	80%	70%	0.01	0.05	0.01	0.01	0.05
F2	0.082	1.7	4	0.11	12775	0.04	511	80%	70%	0.00	0.00	0.00	0.00	0.00
F3	0.082	1.7	4	0.11	9125	0.04	365	80%	70%	0.00	0.00	0.00	0.00	0.00
F4	0.082	1.7	4	0.11	50735	0.18	9132	80%	70%	0.02	0.10	0.02	0.02	0.10
R1	0.082	1.7	17	1.00	N/A	N/A	2670	80%	70%	0.02	0.08	0.02	0.02	0.11
R2	0.082	1.7	17	1.00	N/A	N/A	5120	80%	70%	0.03	0.15	0.05	0.05	0.21
R3	0.082	1.7	17	1.00	N/A	N/A	4038	80%	70%	0.03	0.12	0.04	0.04	0.16
R4	0.082	1.7	17	1.00	N/A	N/A	211	80%	70%	0.00	0.02	0.01	0.01	0.03
R5	0.082	1.7	17	1.00	N/A	N/A	211	80%	70%	0.00	0.02	0.01	0.01	0.03
R6	0.082	1.7	17	1.00	N/A	N/A	1293	80%	70%	0.01	0.04	0.01	0.01	0.05
R7	0.082	1.7	5	0.16	N/A	N/A	1913	80%	70%	0.00	0.01	0.00	0.00	0.01
R8	0.082	1.7	5	0.16	N/A	N/A	9410	80%	70%	0.01	0.04	0.01	0.01	0.05
R9	0.082	1.7	17	1.00	N/A	N/A	1513	80%	70%	0.01	0.05	0.01	0.01	0.06
TOTAL:										0.16	0.69	0.20	0.88	

¹ - Numbers derived from AP-42 (Version 10/97) Table 13.2.1.2 - Average of low ADT default values

² - Per OEPA guidelines (RACM), emission estimates were reduced by 70% to account for the sweeping of the paved area 3 times/week.

³ - Potential PM/PM₁₀ emissions after the modification are scaled based on the hourly increase for truck traffic and no change for employee traffic.

⁴ - Per OEPA guidelines (RACM), emission estimates were reduced by 80% to account for posted speed limits of 15 mph.

CLOW WATER SYSTEMS COMPANY
Coshocton, OH
Emission Unit Calculations

$$E = [k \cdot (s/12)^a \cdot (W/3)^b] \cdot (365 \cdot p)/365$$

E = emission factor (lb/VMT)
 k, a, and b are empirical constants
 s = surface material silt content (%)
 M = surface material moisture content (%)
 p = number of days with at least 0.01 in. of precipitation per year
 W = mean vehicle weight

CLOW Water Systems Company
 Coshocton, OH

Unpaved Road Emission Calculation
 AP-42, 11/2006 Chapter 13.2.2

Unpaved Roadways

PM Emissions		k (lb/VMT)	a	b	s (%)	S (mph)	M (%)	W (tons)	p (days)	E (lb/VMT)	Vehicle Miles Traveled Per Hour (VMT/hr)	Vehicle Miles Traveled Per Year (VMT/year)	Control Efficiency (%) ¹	Emissions lb/hr	Emissions tons/yr
Unpaved Roadways															
	Slag Truck	4.9	0.7	0.45	6	15	0.2	22.43	140	4.5975	15	244	80%	13.8	0.11
	Sand Truck	4.9	0.7	0.45	6	15	0.2	14.5	140	3.7781	15	1,694	80%	11.3	0.64
	Large Lift Trucks	4.9	0.7	0.45	6	15	0.2	27.5	140	5.0392	15	1,882	80%	15.1	0.95

PM₁₀ Emissions

PM ₁₀ Emissions		k (lb/VMT)	a	b	s (%)	S (mph)	M (%)	W (tons)	p (days)	E (lb/VMT)	Vehicle Miles Traveled Per Hour (VMT/hr)	Vehicle Miles Traveled Per Year (VMT/year)	Control Efficiency (%) ¹	Emissions lb/hr	Emissions tons/yr
Unpaved Roadways															
	Slag Truck	1.5	0.9	0.45	6	15	0.2	22.43	140	1.2252	15	244	80%	3.7	0.03
	Sand Truck	1.5	0.9	0.45	6	15	0.2	14.5	140	1.0069	15	1,694	80%	3.0	0.17
	Large Lift Trucks	1.5	0.9	0.45	6	15	0.2	27.5	140	1.3429	15	1,882	80%	4.0	0.25

Moisture content of 0.2% assumed from another Central Ohio facility.
 Silt Content of 6.0% from AP-42, Table 13.2.2 - 1 for Iron and Steel Production Facilities
 Control efficiency for 15 mph speed reduction from RACM, Table 2.1.1-3 Ohio EPA (Facility posted speed limit is 11 mph)

CLOW WATER SYSTEMS COMPANY
Coshocton, OH
Emission Unit Calculations

Flow Diagram Designation
Slag Pile (Beneficial Reuse Area)

Maximum Operating Schedule
10 hrs/day
3,650 hrs/year

Load In and Load Out Emission Calculations:

$E \text{ (lb/ton)} = k * 0.0032 * [(U/5)^{1.3}] / [(M/2)^{1.4}]$ from AP-42, Fifth Edition, Section 13.2.4 "Aggregate Handling and Storage Piles" November, 2006.

		<u>PM</u>	<u>PM-10</u>
Particle size multiplier	k =	0.74	0.35
Mean wind speed (mph)	U =	5.00	5.00
Material moisture content (%)	M =	0.92	0.92
Emission factor (lb/ton)	E =	7.02E-03	3.32E-03

Maximum Capacity (Pile Loading Rate)

	<u>Tons/hour</u>	<u>Tons/year</u>
PM	4.62	16,878
PM-10	4.62	16,878

Assuming that the Load Out rate is the same as the Load In rate:
PM/PM-10 Emissions from Load In and Load Out Operations:

Potential Emissions	<u>lb/hour</u>	<u>tons/year</u>
PM	0.06	0.12
PM-10	0.03	0.06

Wind Erosion Emission Calculations:

From USEPA's Handbook for Dust Control at Hazardous Waste Sites (EPA Document #540285003, Nov, 1985):
 $E = 1.7 * (s/1.5) * [(365 - p)/235] * (f/15)$

		<u>PM</u>	<u>PM-10</u>
Silt content (%)	s =	5.3	5.3
Number of days with > 0.01 in. of precipitation per year	p =	140	140
Percentage of time that the unobstructed wind speed exceeds 12 mph at the mean pile height (%)	f =	4	4
Emission factor in (lb/day/acre)	E =	1.47	1.47

Maximum Pile Capacity

Area of Solid Waste Pile (acres) = 0.500

PM Emissions from Wind Erosion:

For maximum emissions, consider 365 days per year

PM Emissions:	<u>PM</u>	<u>PM-10</u>
Hourly Emissions (lbs/hour)	0.07	0.07
Annual Emissions (tons/year)	0.13	0.13

Total Storage Pile Emissions

PM Emissions:	<u>PM</u>	<u>PM-10</u>
Hourly Emissions (lbs/hour)	0.14	0.10
Daily Emissions (lbs/day)	3.32	2.50
Annual Emissions (tons/year)	0.25	0.19

EXAMPLE CALCULATIONS:

PM Emissions (TPY) = Emission Factor (lb/acre/day) x (acres) x (365 days/year) x (1 ton/2000 lbs)

CLOW WATER SYSTEMS COMPANY
Coshocton, OH
Emission Unit Calculations

Flow Diagram Designation
Sand Pile (Beneficial Reuse Area)

Maximum Operating Schedule
10 hrs/day
3.650 hrs/year

Load In and Load Out Emission Calculations:

$E \text{ (lb/ton)} = k * 0.0032 * [(U/5)^{1.3}] / [(M/2)^{1.4}]$ from AP-42, Fifth Edition, Section 13.2.4 "Aggregate Handling and Storage Piles" November, 2006.

		PM	PM-10
Particle size multiplier	k =	0.74	0.35
Mean wind speed (mph)	U =	5.00	5.00
Material moisture content (%)	M =	7.40	7.40
Emission factor (lb/ton)	E =	3.79E-04	1.79E-04

Maximum Capacity (Pile Loading Rate)

	Tons/hour	Tons/year
PM	15.31	55,899
PM-10	15.31	55,899

Assuming that the Load Out rate is the same as the Load In rate:

PM/PM-10 Emissions from Load In and Load Out Operations:

Potential Emissions	lb/hour	tons/year
PM	0.01	0.02
PM-10	0.01	0.01

Wind Erosion Emission Calculations:

From USEPA's Handbook for Dust Control at Hazardous Waste Sites (EPA Document #540285003, Nov, 1985):

$E = 1.7 * (s/1.5) * [(365 - p)/235] * (f/15)$

		PM	PM-10
Silt content (%)	s =	2.6	2.6
Number of days with > 0.01 in. of precipitation per year	p =	140	140
Percentage of time that the unobstructed wind speed exceeds 12 mph at the mean pile height (%)	f =	4	4
Emission factor in (lb/day/acre)	E =	0.72	0.72

Maximum Pile Capacity

Area of Solid Waste Pile (acres) = 0.500

PM Emissions from Wind Erosion:

For maximum emissions, consider 365 days per year

PM Emissions:	PM	PM-10
Hourly Emissions (lbs/hour)	0.04	0.04
Annual Emissions (tons/year)	0.07	0.07

Total Storage Pile Emissions

PM Emissions:	PM	PM-10
Hourly Emissions (lbs/hour)	0.05	0.04
Daily Emissions (lbs/day)	1.14	1.00
Annual Emissions (tons/year)	0.09	0.08

EXAMPLE CALCULATIONS:

PM Emissions (TPY) = Emission Factor (lb/acre/day) x (acres) x (365 days/year) x (1 ton/2000 lbs)

Kimbra Reinbold - FW: Corrected First page to July 3 letter

From: "Rettig, Danette M." <dmrettig@vssp.com>
To: <kimbra.reinbold@epa.state.oh.us>
Date: 7/6/2007 8:11 AM
Subject: FW: Corrected First page to July 3 letter

<<First pg. to July 3 letter.pdf>>

Ms. Reinbold,

Attached is the first page of the correspondence Bill Hayes sent to you on July 3, 2007. I apologize for not realizing that the date on the first page of the original letter was not on automatic update. The original first page reads June 18, 2007. Please replace with this corrected page.

Again, I apologize for the oversight.

Thank you.

Dani Rettig
Secretary
Vorys, Sater, Seymour and Pease LLP

From the law offices of Vorys, Sater, Seymour and Pease LLP.

IRS CIRCULAR 230 DISCLOSURE: In order to ensure compliance with requirements imposed by the U.S. Internal Revenue Service, we inform you that any federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing, or recommending to another person, any transaction or other matter addressed herein.

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Vorys, Sater, Seymour and Pease LLP

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Arthur L. Vorys
1856-1933
Lowry F. Sater
1867-1935
Augustus T. Seymour
1873-1926
Edward L. Pease
1873-1924

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E-Mail - wdhayes@vssp.com

July 3, 2007

Kimbra Reinbold
Division of Air Pollution Control
Southeast District Office
2195 Front Street
Logan, Ohio 43138

Re: Clow Water Systems Company
Facility ID# 0616010006

Dear Kim:

Our firm represents Clow Water Systems, Inc. (Clow). Given that the majority of issues SEDO has raised relate to submittals prior to assuming her current position, Heather Klesch has requested our assistance in responding to your May 30, 2007 letter. Likewise, Craig Schmiesser of RMT assisted in preparing this response. Because of the thoroughness of your letter, we have formatted this response in the same general order as your letter.

As you will note throughout this letter, for the renewal application, Clow performed a very in-depth review of installation and modification dates, and the dates in the renewal control, rather than the dates in the original application. As with all facilities throughout the U.S., the original application was the first foray in to Title V, and often those who prepared the application often did not utilize the term "modification" in the regulatory sense. Ohio EPA is incorrect to assume that the original application dates control to cite Clow with a violation. Please note that per Ohio EPA direction, when an installation date pre-dating the Ohio EPA rules can not be confirmed, Clow has used the date 6/72 as a default.

Alleged Violations

PTI Requirements; OAC 3745-31-02(A)(1)

You note that on March 19, 2007 you received installation certifications for P035, P036, P037, and P038 indicating the emissions units were installed on December 20, 2006. In STARS, the installation date is also given as December 20, 2006. You

Kimbra Reinbold - Clow Water Systems

From: "Hayes, William D." <WDHayes@vssp.com>
To: <kimbra.reinbold@epa.state.oh.us>, "Craig Schmeisser" <Craig.Schmeisser@rmtinc.com>
Date: 7/3/2007 4:10 PM
Subject: Clow Water Systems
CC: "Heather Klesch" <heather.klesch@clowwater.com>, <jeff.otterstedt@clowwater.com>, "Jeet Radia" <jradia@mcwane.com>, <atrutt@maynardcooper.com>

Kimbra- per our conversation today, please find attached the response letter and several attachments. For the reasons discussed, I will plan to get you the referenced calculations on Thursday or Friday. Have a great holiday and do not hesitate to call if you have any questions. I look forward to working with you. Bill

513-723-4024
wdhayes@vssp.com

From: sharescan_CIN
Sent: Tuesday, July 03, 2007 4:02 PM
To: Hayes, William D.
Subject: Ltr to Kimbra Reinbold re Clow Water Systems

<<Ltr to Kimbra Reinbold re Clow Water Systems.pdf>> <<Attachment.pdf>> <<foundry inspection examples.pdf>>
<<Daily Inspection of Foundry Stacks.pdf>>

From the law offices of Vorys, Sater, Seymour and Pease LLP.

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June 18, 2007

Kimbra Reinbold
Division of Air Pollution Control
Southeast District Office
2195 Front Street
Logan, Ohio 43138

Re: Clow Water Systems Company
Facility ID# 0616010006

Dear Kim:

Our firm represents Clow Water Systems, Inc. (Clow). Given that the majority of issues SEDO has raised relate to submittals prior to assuming her current position, Heather Klesch has requested our assistance in responding to your May 30, 2007 letter. Likewise, Craig Schmiesser of RMT assisted in preparing this response. Because of the thoroughness of your letter, we have formatted this response in the same general order as your letter.

As you will note throughout this letter, for the renewal application, Clow performed a very in-depth review of installation and modification dates, and the dates in the renewal control, rather than the dates in the original application. As with all facilities throughout the U.S., the original application was the first foray in to Title V, and often those who prepared the application often did not utilize the term "modification" in the regulatory sense. Ohio EPA is incorrect to assume that the original application dates control to cite Clow with a violation. Please note that per Ohio EPA direction, when an installation date pre-dating the Ohio EPA rules can not be confirmed, Clow has used the date 6/72 as a default.

Alleged Violations

PTI Requirements; OAC 3745-31-02(A)(1)

You note that on March 19, 2007 you received installation certifications for P035, P036, P037, and P038 indicating the emissions units were installed on December 20, 2006. In STARS, the installation date is also given as December 20, 2006. You

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also indicate that operation began in the first week of January 2007. (Please note that no installation certificate has yet been submitted for P037 as it has not yet been installed).

Please remember that three of these sources were exempt under 3745-31-03 and the fourth was permitted as an uncontrolled source. Until the installation of a baghouse, all four sources could legally emit uncontrolled. It is the act of installing the baghouse that results in the loss of the exemption. Once emissions are being controlled and vented outside, a PTI was necessary, and that was the purpose of the PTI issued 1/30/07. What was actually installed was the baghouse (which as a control does not need a permit). This baghouse now controls previously existing uncontrolled exempt emissions units. Clow disputes any PTI violation alleged by Ohio EPA SEDO.

ok **Installation Certification Part I, Section B.8. of PTI # 06-08238**

Ohio EPA alleges a violation of the requirement to submit a certification upon completion of construction but prior to start-up. Clow acknowledges that the certifications were submitted after the baghouse was installed and units started up as controlled, rather than exempt or permitted uncontrolled sources, and apologizes for this minor oversight.

Monitoring and Recordkeeping Part III. Section A.III.1 of PTI # 06-07603

The Ohio EPA alleges that Clow was in violation of the PTI for emissions unit P007 because Clow was conducting daily inspections for visible emissions from the building egress points rather than at the capture hoods, as allegedly required by the PTI. The Ohio EPA states that conducting such observations at the egress points would be a relaxation of the current requirements.

Clow's position remains that the requirement to perform weekly checks when the emission unit is in operation for visible emissions from the side draft hood allows for the observation at building egress points. Emissions that are not captured by the side draft hood would be emitted into the ambient air at the egress points. The fact that Ohio EPA uses language qualifying the observations as "...when the weather conditions allow,..." certainly infers the observations are to be made outside. If the observations were intended to be conducted inside at the actual hood, the weather qualification makes no sense.

Clow maintains that the permit requires the company to conduct a weekly check for visible emissions that escape the side draft hood at building egress points. However, in order to address your concerns, Clow is now conducting VE observations at an inside location at the side draft hood. Clow is also conducting daily, rather than

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the required weekly, observations. Clow is presently going beyond the requirements to of the permit, and is not in violation.

Complaint Investigation

Clow appreciates the language of your letter in which you state that Clow may be causing a violation of OAC rule 3745-15-07. We do not feel that one recent complaint from a single individual can in fact constitute a public nuisance. Further, as you know, a sample of dust collected by a complainant would not meet basic evidentiary standards to support a nuisance allegation, whether public or private.^a

Regardless of the lack of support for a 3745-15-07 citation, Clow is committed to both its employees and neighbors to minimize or eliminate emissions of fugitive dust where possible, even if not required by applicable requirements. To that end, and in addition to meeting with the complainant, Clow plans to take the steps outlines in the attached May 25, 2007 letter to the neighbor. These actions are voluntary on Clow's part.

Title V renewal Application Questions and Comments

- OK (1) *Pouring Main Floor (F008). This unit is listed as shut down in Clow's Title V renewal application, and the comments indicate the name was changed but not to what. This unit was identified as still operating during the Title V inspection. Further, Clow's initial TV permit application shows this unit was modified in 6/89. Clow must evaluate this unit and inform Ohio EPA of its status. If the unit was modified in 1989, Clow must submit a PTI application if applicable. STARS must be updated to show the correct status of this unit and if it is a non-insignificant unit, the application forms for this unit must be added to STARS.*

F008 was shut down as reflected in the Title V renewal application. Clow has renamed the source to more accurately reflect the operation. Basically, what you observed during the inspection was Z129, what we now call "No Bake Pouring and Cooling", which is an insignificant emissions unit per OAC 3745-15-05.

- OK (2) *Jolt Line (F007, F009, P007). The modification date for these units, September 2006 as indicated on the installation certifications, must be identified in the Title V renewal application is STARS. Further, the original Title V permit application indicates that EU F009 (Jolt Pouring and Cooling) was modified in 6/89. Please provide Ohio EPA with the verified installation date and any modification dates (prior to 9/06) for EU F009.*

The TV renewal application was submitted in December of 2004, and the PTI was last

^a Please forward copies of any analysis the agency has done on this sample, along with chain of custody documents.

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modified on December 28, 2006. Per the permit and rules, Clow has one year to update the permit and/or application (December 2007), but will go ahead and do so within the next 90 days. → from beginning of op of unit

For F009, the installation date is June 1936 as reflected in the new application. The dates of modification for the Jolt Line occurred after the TV renewal application was submitted, and are 6-13-06, 8-22-06, 10-13-06, and 12-28-06.

76 (3) *BMM Pouring (F010). The original Title V permit application for this unit indicates it was installed in 1936 and modified in 6/89. The renewal application indicates this unit was installed in 6/73 and was never modified. Please provide Ohio EPA with the verified installation date and any modification dates for this unit.*

The original application used 1936, but this could not be confirmed. Upon review and employee interviews, it appears to have been installed in June of 1973 during shutdown.

77 (4) *Fittings Grinding (F011). The Title V renewal application indicates this unit is now considered insignificant and is exempt pursuant to OAC rule 3745-31-03. Please provide Ohio EPA the basis for this change in status. Further, the original Title V application indicates this unit was installed in 6/74, but the renewal application indicates it was installed in 6/72. Please provide Ohio EPA with the verified installation date of this unit.*

The basis for the exempt status is the language of 3745-31-03(A)(1)(z). This unit was reconfigured to emit inside the building. Because the date used in the original application as the installation date could not be confirmed, 6/72 was used as a default in the renewal application.

© (5) *Pipe Finishing - Grinder 300.E3 & Scrapers 300.C4 & C5 (F013). This unit is not included in the current Title V permit, and STARS shows this unit as "not required and canceled per Kay Gilmer as part of Title V review 8/99". However, documentation of this determination could not be located in Ohio EPA's files. If Clow has a copy of the 8/99 determination, please provide it to Ohio EPA. I did find the inspection letter from May 1999, and in that letter Ms. Gilmer identified this unit as small enough to be considered insignificant, but she did not indicate that coverage under the Title V permit was not required. Please provide Ohio EPA with the correct status of this unit and update STARS as applicable. In addition, please verify the installation date for this unit; STARS indicates it was installed in 6/78.*

These units are no longer at the facility.

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- jk (6) *BMM Shakeout (F016). The original Title V permit application for this unit indicates it was installed in 1/73 and modified in 6/74. The renewal application indicates this unit was installed in 6/72 and was never modified. Please provide Ohio EPA with the verified installation date and any modification dates for this unit.*

A default installation date of 6/72 was used because the actual installation date could not be confirmed, only that the unit was a pre-1972 installation. There are no dates of modification.

- dk (7) *Charge Handling (F017). The original Title V permit application for this unit indicates it was installed in 6/72 and modified in 6/88. The renewal application indicates this unit was never modified. Please confirm whether or not this unit was modified in 6/88.*

A default date of 6/72 was used as the actual pre-1972 installation date could not be confirmed. This unit was not modified in 1988.

- dk (8) *Centrifugal Casting Machines #s 1-6 (F018). The original Title V permit application indicates this unit was installed in 6/49 and was modified in 6/95, while the renewal application lists the installation date as 6/72 and a modification date of 1/79. Clow must provide Ohio EPA with the verified installation and modification dates for this unit. The un-permitted status of the unit as modified in 1/79 was identified in the December 30, 2004 Director's Final Findings and Orders, but as indicated in the letter dated April 13, 2007, this violation has yet to be resolved.*

A default installation date of 6/72 was used in the renewal because the original application's installation date of 6/49 could not be confirmed. There was no modification in 1995, but there was a modification in January of 1979, which is addressed in the 2004 DFFO's. The DFFO's acknowledge the modification in 1979, and Heather Klesch will be submitting a PTI application this week.

F018 consists of six centrifugal casting machines. An application to modify F018 to include a seventh machine was submitted, but returned. The request by SEDO was to permit the seventh machine separately, however the seventh machine was never installed.

- dk (9) *Roads (F019).*

- a) *Although this unit is a non-insignificant emissions unit in the existing Title V permit, the renewal application indicates this unit is now considered insignificant and is exempt pursuant to ORC § 3704.036. Clow must provide Ohio EPA the potential to emit calculations for this unit that were*

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used to conclude that this unit is now insignificant.

These calculations will be submitted by Friday.

- b) *A section of unpaved roadway was added when the new beneficial reuse area was put into service in late March of 2007. Did the addition of this roadway constitute a Chapter 31 modification of this unit? Please provide Clow's evaluation of this change as it impacts fugitive emissions from this source.*

jk The use of this "Beneficial Re-use Segment" does not constitute a Chapter 3745-31 modification because F019 does not have an "allowable" and none of the other modification criteria are triggered. Calculations for this segment will be forwarded by Friday, but will not change F019's status.

- c) *The original Title V application indicates this unit was installed in 6/72 and was modified in 6/95, but the renewal application does not indicate this unit was modified after installation in 6/72. Please confirm whether or not this unit was actually modified in 6/95. Was this when previously unpaved roadways at the facility were paved?*

jk The 6/72 renewal application date controls as there is no way to determine exactly when these roadways were established early in the last century. There have been no modifications, and the Beneficial Re-use Segment will be included with the calculations that you will receive later this week.

- Oh* (10) *Centrifugal Casting Machine #7 (F021). A PTI for this unit (#06-07111) was issued on May 1, 2003, but you indicated that this unit was never installed so this PTI is expired. However, this unit is identified as a non-insignificant unit in STARS with an expected installation date of 7/05. Please update STARS to show this unit as shut down/never installed, as applicable.*

The unit was never installed and PTI expired. Clow hopes to submit the requested update within the next 90 days.

- Oh* (11) *Fittings Painting (K002). The original Title V permit application for this unit indicates it was modified in 7/93. The renewal application indicates this unit was installed in 6/65 and was never modified. Please provide Ohio EPA with the verified installation date and any modification dates for this unit.*

K002 was installed sometime in 1965 as indicated in the renewal application, and has

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never been modified.

- ok (12) *Pipe Painting - Small Line (K006). The original Title V permit application for this unit indicates it was installed in 6/60 and modified in 8/93. The renewal application indicates this unit was installed in 6/72 and was modified in 6/93. Please provide Ohio EPA with the verified installation date and any modification dates for this unit.*

An installation date of 6/72 was used as a default as Clow was unable to verify the date used in the original application. The unit was modified in June of 1993 during shutdown. As you know, this unit now utilizes water based coatings.

- ok (13) *Small and Large PUNB Mold and Core Wash (K007 and K008). The original Title V permit application for these two units indicates they were installed in 1/90, but the renewal application indicates the units were installed in 1/70. Please provide Ohio EPA with the verified installation dates for these units.*

The units were installed in 1/70.

- ok (14) *Annealing Oven (P020). Both the initial and renewal Title V permit applications identified this unit as being installed in 6/77, but in the initial application a modification date of 6/90 was provided. Clow must verify whether or not this unit was modified in 1990. The un-permitted status of the unit (based on the installation date of 6/77) is identified in the letter dated April 13, 2007; however, this violation has yet to be resolved.*

P020 was not modified in 1990. A PTI application was submitted with the PSD application package. The unit has a PTO.

- ok (15) *Cupola Hot Blast Furnace (P033). The original Title V permit application for this unit indicates it was installed in 6/60 and was modified in 8/89. The renewal application also indicates this unit was installed in 6/60 but no modification date is listed. Please provide Ohio EPA with the verified installation date and any modification dates for this unit. Please confirm whether or not this unit was modified in 8/89.*

The unit was installed in 6/60 and there has been no modification. Please note that there is a permit modification pending as related to the syngas project.

- ok (16) *Shell Core Machine #4 (P034). This emissions unit is listed as a new, non-*

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insignificant unit in the Title V renewal application, although the original Title V application indicated this unit, installed in 12/77, was exempted because of its de minimis status. A PTI (#06-08030) was issued for this unit on April 18, 2006. To date, no facility or EAC forms have been provided for this unit in the renewal application, so if Clow verifies its non-insignificant status, the application forms need to be added to STARS.

Clow hopes to submit the requested forms within the next 90 days.

- (17) *Air pollution control equipment (APCE). The new baghouse serving emissions units P035, P036, P037 and P038 needs to be added to the Title V renewal application in STARS. Clow is also advised to review the APCEs listed in STARS and ensure that the most current APCE for each unit, if applicable, is listed.*

Clow will take the recommended steps as related to STARS.

Additional or General Comments:

- (1) *Clow is in the process of closing an area on the northwest side of its property that continues to be used to dispose of spent foundry sand and slag. At the end of March 2007, the company began using another beneficial reuse area that is north and east of the current disposal area. As we discussed during the inspection, it does not appear that the current reuse area is considered an emissions unit under Clow's current Title V permit, although it is unclear whether potential fugitive dust emissions from management of the waste material have ever been evaluated. In other industries and in landfill operations, particulate emissions from truck unloading, wind erosion, and pile maintenance activities are usually regulated, even though particulate emissions are relatively low.*

To resolve this issue, Clow must provide Ohio EPA with an evaluation of the existing and new beneficial reuse areas and calculations of potential fugitive emissions from these areas. Enclosed is a copy of the spreadsheet Ohio EPA uses for this type of evaluation. While it is likely the current and new areas would be de Minimis (no regulations apply) or otherwise considered insignificant units, they would still need to be included in the Title V renewal application unless there are no potential particulate emissions.

Clow has evaluated these emissions and confirmed their de minimis status. Copies of the calculations will be forwarded to you by Friday.

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- (2) As we discussed during the inspection, the Title V compliance certification received on May 1, 2007 did not include a reference to Part I.A.6.a. of the Title V permit for the cupola operating parameter deviations. In addition, three deviations reported in 1st Q 2006 were not reported on the compliance certification. The three deviations were not reported because based on review of the company's records, these were not actual deviations because the unit was shut down at the time and no emissions occurred. On May 11, 2007, Ohio EPA received a revised Title V compliance certification that includes a reference to Part I.A.6.a. of the Title V permit for the cupola operating parameter deviations. Thank you for resolving this omission.

This comment requires no further action.

- (3) During a recent complaint investigation by Ohio EPA's Division of Hazardous Waste Management, staff from the Southeast District Office documented there had been a break in the water line that supplies water to the wet cap of the cupola on February 2, 2007. Did this incident constitute a malfunction of emissions unit P901 as defined in OAC rule 3745-15-06? Verbal or written notification of the incident was not provided to the Division of Air Pollution Control, so if the incident did constitute a malfunction as defined in the rule, Clow would be in violation of the malfunction reporting requirement in Part I, Section A.2 of its Title V permit.

The pipe that broke on 2/02/07 provides make-up process water for either the wastewater treatment plant or emission control system. This line does not convey water to or from the wet cap. The incident did not qualify as a malfunction of P901 under 3745-15-07 and did not require verbal or written reporting to SEDO, and Clow is not in violation of this rule.

- (4) To date, DAPC/SEDO has not received a response to the warning letter dated April 13, 2007. The violations cited in that letter remain unresolved and an extension has not been requested. Clow must, at a minimum, provide a response to that warning letter with the response to this letter as required below. Further, please note that additional PTI violations will be cited if, after review of the permitting information requested above, Ohio EPA confirms that additional emissions units were installed or modified without PTIs.

The following discussion addresses the issues raised in your April 13, 2007 letter, in the order of your letter. Clow apologizes for the delay in responding to these issues, however, the company was focused on reviewing the status of F018 as per your request.

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April 13, 2007 Letter from SEDO

In terms of the April 13th letter, Clow provides the following response to your questions, some of which are addressed above:

Violations:

(1) *PTIs Required*

- (a) *In Ohio EPA's Title V inspection letter dated October 8, 2004, Clow was asked to provide the installation and modification dates of all of the emissions units at Clow's Coshocton facility. In an Email dated November 9, 2004, Patrick Huth responded that the emissions unit information would be provided in Clow's Title V renewal application. This application was received by Ohio EPA on December 10, 2004 and revisions were received on December 20, 2004. The installation and modification data provided in the renewal application was retrieved from STARS and was compared to Ohio EPA's permitting records for the facility, and it was determined that the following non-exempt emissions units were installed or modified without first obtaining PTIs:*

F018 (formerly Z003) - centrifugal casting machines 1-6; installed in June 1972 and modified in January 1979

K006 - pipe paint operation (small line); installed in June 1972 and modified in June 1993; and

P020 - annealing oven; installed in June 1977.

To resolve these violations, Clow must apply for and obtain PTIs for the emissions units listed above. Please note that emissions units K006 and P020 have been included in Clow's PSD permit for the cupola modifications for the purposes of obtaining federally enforceable emissions limitations and natural gas usage restrictions to ensure compliance with facility-wide emission rates protective of the National Ambient Air Quality Standards ("NAAQS"). However, the PTIs for these two units do not address the BAT requirements in OAC rule 3745-31-05(A)(3) or any other requirements that would have been applicable when the units were installed or modified.

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Upon review, it does not appear there are any violations that need to be addressed.

- F018 application will be submitted this week.
- K006 PTI modification application was submitted with PSD package
- P020 has already been submitted
- K006 and K020 are representative of BAT without the necessity of a BAT study, given that the permitted emissions are as follows:

K006	K020
PM 1.20 tpy PM	2.17 tpy PM
PM10 1.20 tpy PM10	2.17 tpy PM10
Water based coatings	0.17 tpy SOX
	28.49 tpy NOX
	1.57 tpy VOC
	23.93 tpy CO

- (2) No installation or modification dates were provided for emissions unit Z129 which is identified as exempt per Ohio Revised Code § 3704.036. Clow must provide Ohio EPA with the installation and modification dates for this unit and the company's evaluation of whether a PTI should have been obtained for this unit. If a PTI was required, Clow must submit a complete PTI application.

Please see response to paragraph 1 on page 3.

(3) **Emissions Testing**

Part III.A.V.2 of PTI # 06-07603 for emissions units F007 and P007, issued on June 13, 2006 and modified on October 12 and December 28, 2006, requires emissions testing to demonstrate that the baghouse serving emissions units F004, F007 and P007 is in compliance with the combined emissions limitation for PE. This testing was required to be conducted within 6 months after the modification of the emission units. The installation certification provided by Clow indicated that the modification was completed on September 19, 2006, so the testing was required to be completed on or before March 19, 2007.

The ITT notification received by Ohio EPA on March 19, 2007 states that the emissions testing for these units will be conducted on April 17, 2007, approximately one month late. No further action is required at this time to address this violation.

Testing has been completed. The testing was conducted in accordance with the

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PTI issued 12/28/06.

Title V Permit Renewal Application Questions and Comments:

¹
ch (4) Emissions unit F022, formerly emission unit Z073, was added in the Title V renewal application. However, emissions unit Z073 was not identified as shut down. Clow's renewal application must be revised to identify emissions unit Z073 as permanently shut down.

F022 did not exist until after the renewal application was submitted, so it is not surprising that it is not reflected there. Clow will update the application to show F022 and also reflect Z073 as shutdown. *already there*

²
ch (5) PTI # 06-08030 was issued on April 19, 2006 for emissions unit P034. This unit needs to be added to the Title V renewal application.

This has been submitted.

³
ch (6) PTI # 06-08238 was issued on January 30, 2007 for emissions units P035, P036, P037 and P038. These units need to be added to the Title V renewal application.

This has been submitted as part of the Fee Emissions Report via STARS in February 2007.

⁴
ch (7) Emissions units Z009, Z057, Z076, and Z077 are identified in the application as non-Title V only. Please elaborate on why these units were added to Clow's Title V renewal application.

Z009 is a locomotive, an exempt mobile source
Z057 is a drying oven less than 4 MMBTU
Z076 is the small paint pad line that has no emissions
Z077 is the paint pad line with no emissions

These were shown on the application to demonstrate that they had been evaluated and had no emissions or were not regulated.

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Hopefully this addresses the issues raised in your letters. Please feel free to contact Heather Klesch (740-291-1087) if you have any comments or questions. It is Clow's goal to resolve any outstanding questions related to the facility's permitting status, and we certainly look forward to working with you towards that goal.

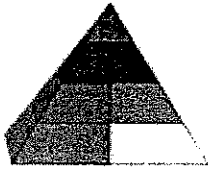
Sincerely, .

A handwritten signature in black ink, appearing to read "Ben", written over the printed name William D. Hayes.

William D. Hayes

WDH/wdh

cc: Alan Truitt, Esq.
Heather A. Klesch, Clow
Jeet Radia, McWane
Craig Schmiesser, RMT



Clow Water Systems Company
Environmental Work Instruction
CWP-EWI-012-01-F02
Air Permitting Requirements
Daily Inspection of Foundry Stacks



Issue Date: 05/17/07
Rev. Date:
Page 1 of 2

Week starting _____

JJL and BMM Roof Vents

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately							
Person Contacted							
Time contacted							
Corrective action taken							

JJL (F007 & P007) - Fugitive emissions at sand system drop points and shakeout side draft hood

Visible emissions (Y or N) If YES, report to Environmental Department immediately							
Person Contacted							
Time contacted							
Corrective action taken							

JJL - Inoculation baghouse stack emissions

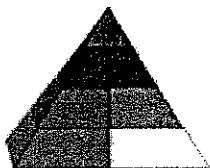
Visible emissions (Y or N) If YES, report to Environmental Department immediately							
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)							
Area cleanliness (S or U)							

AISCO Drum (F002) - Visible emissions from the AISCO drum

Visible emissions (Y or N) If YES, report to Environmental Department immediately							
Person Contacted							
Time contacted							
Corrective action taken							

BMM Baghouse - Stack Emissions

Visible emissions (Y or N) If YES, report to Environmental Department immediately							
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)							
Area cleanliness (S or U)							



Clow Water Systems Company
Environmental Work Instruction
CWP-EWI-012-01-F02
Air Permitting Requirements
Daily Inspection of Foundry Stacks



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Laempe (F014) - Stack Emissions

Visible emissions (Y or N) If YES, report to Environmental Department immediately*								
Person Contacted								
Time contacted								
Corrective action taken								
Condition of dust collector (S or U)								
Area cleanliness (S or U)								

Large PUNB Mold/Core Making (F005)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*								
Person Contacted								
Time contacted								
Corrective action taken								

Small PUNB Mold/Core Making (F022)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*								
Person Contacted								
Time contacted								
Corrective action taken								



Inspected by								
Date								
Time								
Department Head								

Comments:

* If YES, qualified personnel from Environmental department must observe emissions using CWP-EWI-012-F01

Return completed form to Environmental Department weekly

Y = yes	N = no	S = satisfactory	U = unsatisfactory
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	Clow Water Systems Company Environmental Work Instruction CWP-EWI-012-01-F02 Air Permitting Requirements Daily Inspection of Foundry Stacks	 CLOW WATER SYSTEMS COMPANY Issue Date: 05/17/07 Rev. Date: Page 1 of 2
	Week starting <u>6-11-07</u>	

JJL and BMM Roof Vents

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							

JJL (F007 & P007) - Fugitive emissions at sand system drop points and shakeout side draft hood

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							

JJL - Inoculation baghouse stack emissions

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S	S		
Area cleanliness (S or U)	S	S	S	S	S		

AISCO Drum (F002) - Visible emissions from the AISCO drum

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							

BMM Baghouse - Stack Emissions

	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S	S		
Area cleanliness (S or U)	S	S	S	S	S		



Clow Water Systems Company
Environmental Work Instruction
CWP-EWI-012-01-F02
Air Permitting Requirements
Daily Inspection of Foundry Stacks



Issue Date: 05/17/07
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Page 1 of 2

Laempe (F014) - Stack Emissions

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S	S		
Area cleanliness (S or U)	S	S	S	S	S		

Large PUNB Mold/Core Making (F005)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							

Small PUNB Mold/Core Making (F022)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N	N		
Person Contacted							
Time contacted							
Corrective action taken							

Inspected by	BM	BM	BM	BM	TB		
Date	6-11	6-12	6-13	6-14	6-15		
Time	8 ⁰⁰ AM	7 ³⁰ AM	7 ³⁰ AM	7 ⁰⁰ AM	10 ⁰⁰ AM		
Department Head	BM	BM	BM	BM	BM		

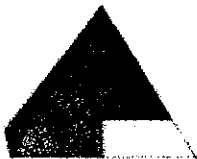

Comments:

* If YES, qualified personnel from Environmental department must observe emissions using CWP-EWI-012-F01

Return completed form to Environmental Department weekly

Y = yes	N = no	S = satisfactory	U = unsatisfactory
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	Clow Water Systems Company Environmental Work Instruction CWP-EWI-012-01-F02 Air Permitting Requirements Daily Inspection of Foundry Stacks	 CLOW WATER SYSTEMS COMPANY Issue Date: 05/17/07 Rev. Date: Page 1 of 2
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Week starting 6-18-07

JJL and BMM Roof Vents	M	T	W	TH	F	SA	SU
Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							

JJL (F007 & P007) - Fugitive emissions at sand system drop points and shakeout side draft hood

Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							

JJL - Inoculation baghouse stack emissions


Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S			
Area cleanliness (S or U)	S	S	S	S			

AISCO Drum (F002) - Visible emissions from the AISCO drum

Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							

BMM Baghouse - Stack Emissions

Visible emissions (Y or N) If YES, report to Environmental Department immediately	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S			
Area cleanliness (S or U)	S	S	S	S			

	<p>CLOW Water Systems Company Environmental Work Instruction CWP-EWI-012-01-F02 Air Permitting Requirements Daily Inspection of Foundry Stacks</p>	<p>CLOW CLOW WATER SYSTEMS COMPANY</p> <p>Issue Date: 05/17/07 Rev. Date: Page 1 of 2</p>
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Laempe (F014) - Stack Emissions

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							
Condition of dust collector (S or U)	S	S	S	S			
Area cleanliness (S or U)	S	S	S	S			

Large PUNB Mold/Core Making (F005)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							

Small PUNB Mold/Core Making (F022)

Visible emissions (Y or N) If YES, report to Environmental Department immediately*	N	N	N	N			
Person Contacted							
Time contacted							
Corrective action taken							

Inspected by	BM	BM	BM	BM			
Date	6-18	6-19	6-20	6-21			
Time	8:30 AM	8:30 AM	6:30 AM	7:00 AM			
Department Head	BM	BM	BM	BM			

Comments:

* If YES, qualified personnel from Environmental department must observe emissions using CWP-EWI-012-F01

Return completed form to Environmental Department weekly

Y = yes	N = no	S = satisfactory	U = unsatisfactory
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CLOW WATER SYSTEMS COMPANY

2007 JUL -9 AM 7:43

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812-6001
(740) 622-6651
FAX (740) 622-8551

May 25, 2007

Mr. Robert Lindsey
2271 South Ninth Street
Coshocton, OH 43812

Re: 05/16/2007 Visit
Clow Water Systems Company
Coshocton, Ohio

Dear Mr. Lindsey:

I appreciate you and your family taking the time to meet with Mr. Dennis Zurakowski, representative of McWane, Inc., and myself at your home. The following are the concerns we discussed during our visit to your home on May 16, 2007:

- Dust Control; and
- Ball Dropping Activities (Vibration and Flying Debris).

As you know, last year Clow undertook a seismology study to determine if it was at all possible that Clow's ball dropping activities could have been contributing to the joint separation of the drywall in your home. This report concluded that the vibrations from ongoing ball dropping activities could not cause structural damage and therefore, could not be causing the dry wall joint separation in your home.

Relative to the dust control, Clow does not believe that it is responsible for the dirt on your home; however, as an attempt to bring this matter to a close, Clow would like to offer the following:

- Plant evergreen trees along the fence line to act as a natural screen during all seasons of the year; and
- Apply water to the waste materials for dust control prior to transportation to our beneficial reuse area.

Until the above tasks are completed, Clow would like to offer you reimbursement of power washing activities in the amount of \$350.00 for power washings, two per year, since October 2005 and future power washings, up to two per year, until the evergreen trees reach 8' in height, at which time Clow will only reimburse one additional power washing.

In addition to the above tasks, Clow will also install the following:

- Netting on the east side of the south scrap yard to contain ball dropping debris.

We hope you feel your concerns have been fully addressed by the above. Clow takes pride in being a good neighbor in this community, so please do not hesitate to contact me at 740-291-1087 if you have any further concerns.

Sincerely,

A handwritten signature in cursive script, reading "Heather A. Klesch". The signature is written in dark ink and is positioned above the printed name and title.

Heather A. Klesch
Environmental Manager
Clow Water Systems Company

Cc: Jeff Otterstedt, Clow Water Systems Company



CLOW WATER SYSTEMS COMPANY

2266 South Sixth Street
P.O. Box 6001
Coshocton, Ohio 43812-6001
(740) 622-6651
FAX (740) 622-8551

Acknowledgement

On this day, May 25, 2007, I acknowledge that I have received a letter of response from Clow Water Systems Company as well as a check in the amount of \$1,400 as reimbursement of power washing activities for October 2005, April 2006, October 2006, and spring 2007.

Signature: _____

Print Name: _____

